

STEPHEN MANLEY

PLAINTIFF

Vs.

**WHITE COUNTY SHERIFF OFFICE
DAVID ROZZI
MARK DELEGADO
JEANNA PITSTICK
WLFI News 18 AFFILIATE**

OWNED BY

**ALLEN MEDIA BROADCASTING
DEFENDANT(S)**

**IN THE
UNITED STATE'S DISTRICT COURT
OF THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON, DIVISION**

ORIGINAL COMPLAINT

JURISDICTION AND VENUE:

1. This Court has jurisdiction under 28 U.S. Code § 1331 and § 1343 because this action arises under the Constitution and laws of the United States.
2. Venue is proper in this district under 28 U.S. Code § 1391(b) because the events giving rise to this claim occurred in this district.

PARTIES

1. Plaintiff Stephen Manley is a resident of Houston, Texas.
2. Defendant(s) White County Sheriff's Department, Deputy David Rozzi, Prosecutor's Jeanna Pitstick, and Prosecutor David Delgado are law enforcement officer's with the White County, Indiana Sheriff's Department And White County Prosecutor's Office.

3. WLFI News 18 Affiliate owned by Allen Media Broadcasting

Factual Allegations

1. On or about and between the dates of November 12, 2023 to December 18, 2023 David Rozzi, And Mark Delgado while acting under the color of law, engaged in actions in which the aforementioned engaaged in a conspiracy and or acted in conceert to deprived Plaintiff of his constitutional civil rights. By knowingly intentionally and recklessly planted plotted and purposely engaged in actions to misrepresent perjured facts that they knew were false which was reduced in writing in a probable cause affidavit and later which led to false charges being brought against plaintiff in a information and indictment in which the state actors acting up under the color of law knew was false by the totality of the circumstances and the clear and convincing facts they hid from persons who had the power to stop the outright fabrication and lies. In conjunction with prosecutors Jeanna Pitstick prosecutor Mark Delgado aided and abetting the efforts of David Rozzi bad acts, perjury, and obstruction of justice, and illegal police misconduct. The defendant(s) colluded and acted under the color of law while simultaneously abusing their officials powers in their individual and professional capacities violated the civil rights of Plaintiff. Defendant's jointly and severably were complicit and acted in concert to abridge the civil rights of Plaintiff's

By manufacturing as well as misrepresenting material fact designed violate the United State Constitution and in doing so deprived Plaintiff of his due process rights, freedom, liberty, character, privacy and right of seclusion. The fabrications made by David Rozzi in his December 18, 2023 Probable Cause Affidavit the Defendant's collectively knew at the time the statements made were indeed false and designed to deprive Plaintiff of his Fourth and Fourteenth amendment right to due process, equal protection and from illegal search and seizure rights as well as his constitutional rights to

privacy and/or seclusion which was invaded by WLFI news 18 affiliate owned by Allen media broadcasting who further defamed Plaintiff's character and cast defended in a false light in a broadcast before the public due to the lies. And false statements of Defendant's who recklessly relied upon the sworn lies of David Rozzi false Probable Cause Affidavit which falsely asserted that Plaintiff crashed into Rikki Scripter at an intersection. WLFI and it's various employees of the news station and family members of Rikki Scripter who was operating a 2004 pontiac grand prix in fact struck the rear right side of a trailer that Plaintiff was pulling through an intersection causing the collision. David Rozzi and the Defendant's with held the fact that Rikki Scripter was under the influence of meth and other drugs and violated other traffic laws on 11-12-2023 many critical facts that were in then exaiting knowledge were intentionally, purposely, and recklessly omitted from the Defendant's collective Probable Cause Affidavit and Information and or indictment and WLFI news broadcast . Nevertheless the Defendants acted in concert and intentionally, purposely, and recklessly created false statements based off of David Rozzi's false perjury laced Probable Cause Affidavit due to his clear racial animus and hate for African American's.

Claims

1. Defamation Of Character

2. Fabrication Of Evidence

3. False Arrest

4. False Imprisonment

5. Slander

6. Suppression Of Evidence

a. 18 U.S.C, § 1503

b. 18 U.S.C, § 1512

7. C.F.R 25 § 11.404 False imprisonment.

8. 42 U.S. Code § 1983 - Civil action for deprivation of rights

9. Fourth Amendment (via Section 1983 or Bivens)

10. Fifth and Fourteenth Amendments (Due Process and Equal Protection)

Procedural due process violations

Substantive due process violations (e.g., deprivation of life, liberty, or property without a legitimate governmental interest)

Equal protection violations (e.g., racial profiling)

11. Section 1985 (Conspiracy to Interfere with Civil Rights)

Defendant's acted in concert, conspired and aided and abetted David Rozzi fabrications and/or failed to prevent a conspiracy to interfere with Plaintiff's civil rights. Defendant's had knowledge of the conspiracy and the power to stop it but aided the efforts of David Rozzi in their individual and official capacities.

Defendants conspired to interfere with plaintiff's civil rights

Defendant's conspired to obstruct justice with intent to deny equal protection

12. Section 1986 (Neglect to Prevent Conspiracy to Interfere with Civil Rights)

Defendant's acted in concerted and aided and abetted David Rozzi fabrications and failed to prevent a conspiracy to interfere with Plaintiff's civil rights if Defendant's had knowledge of the conspiracy and the power to stop it. Defendant's failed to prevent a the clear conspiracy to violate civil rights,

13. Police Misconduct Claims

Failure to Intervene

Failure to Prevent Misconduct: Officers or officials can be liable for failing to intervene to stop another officer or government official from violating a person's constitutional rights when they had a realistic opportunity to do so.

14. Fabrication of Evidence

Planting or Falsifying Evidence: Government officials fabricating or manipulating evidence to falsely implicate someone in a crime.

15. Fourth Amendment Violation Police Misconduct Investigations

Defendants failed to properly investigate the totality of the circumstances evidence and or the false statements and fabrications contained in David Rozzi December 18, 2023 probable cause affidavit, White County Sheriff's Office leadership and the Prosecutor Office and or the law enforcement officials failed to properly investigate similar allegations of police misconduct or other violations of Plaintiff's rights by David Rozzi and the Defendant's collectively.

17. Failure to Intervene

Equally important Defendants collectively acted in concert and failed to Prevent Officer Misconduct: Officers and/or officials failed to intervene and stop David Rozzi's and the Defendant's or government official from violating plaintiff's constitutional rights when they had a realistic opportunity to do so.

18. Fabrication of Evidence

The defendants have acted in concert and or aided and abetted David Rozzi in falsifying evidence: equally the Government officials have fabricated or manipulating evidence to falsely implicate Plaintiff in a crime

Damages

Plaintiff's seeks Compensatory damages of 10 Million Dollars and Punitive damages of 60 Million Dollars .

Plaintiff's damages included but are not limited to Physical Injuries: .

Including Mental and Emotional Injuries: Emotional distress, trauma, and psychological harm resulting from the violation Plaintiff's for mental suffering, anxiety, depression, and loss of enjoyment of life. If the constitutional violation caused "intestinal emotional squares" or other profound emotional impacts, these are considered part of mental and emotional damages.

Plaintiff' has undergone Pain and Suffering due to the violation's and injuries plaintiff sustained at the unlawful hand of defendant's .

Plaintiff equally seeks damages due to the economic losses and loss of opportunity.

Punitive Damages:

Defendant's actions were egregious malicious, oppressive, and or in reckless disregard of the plaintiff's constitutional rights. Defendant's knowingly, intentionally, and recklessly caused the injuries of Plaintiff sustained physically, mental, injuries caused by the constitutional violations compensating the victim for the significant harm caused.

In conclusion, a plaintiff seeking compensation under § 1983,§1985 § 1986 can recover both compensatory and punitive damages if they can demonstrate that their physical injuries and emotional distress were directly linked to the civil rights violation and that the violation was committed with malicious intent or reckless disregard for their constitutional rights.



CERTIFICATE OF SERVICE

I certify that I mailed by certified U.S. Mail, and /or e-mail, fax, hand return receipt requested, personal delivered, made available in the office of the district clerk a true and accurate copy of the attached documents to the necessary parties.

Stephen Manley/s/
Stephen Manley Etal Pro Se